

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

**IN RE: NATIONAL PRESCRIPTION
OPIATE LITIGATION**

MDL No. 2804

THIS DOCUMENT RELATES TO:

Case No. 1:17-MD-2804

*Conejos County et al v. Purdue Pharma L.P.
et al (1:18-op-45740)*

Judge Dan Aaron Polster

*The City of Miami v. Purdue Pharma L.P. et
al (1:18-op-45664)*

*Hennepin County v. Purdue Pharma L.P. et
al (1:18-op-45232)*

*City Of Newark, New Jersey v. Purdue
Pharma L.P. et al (1:18-op-45761)*

*County of Albany, New York v. Purdue
Pharma L.P. et al (1:18-op-45096)*

*The Mayor & Alderman of the City of
Savannah v. AmerisourceBergen Drug
Corporation et al (1:18-op-45550)*

*The City of Charleston, West Virginia v. Rite
Aid of Maryland, Inc. et al (1:18-op-45224)*

*The Braxton County Commission, West
Virginia v. Cardinal Health, Inc. et al (1:18-
op-45313)*

*The Nicholas County Commission v.
AmerisourceBergen Drug Corporation et al
(1:18-op-45314)*

*The Calhoun County Commission, West
Virginia v. AmerisourceBergen Drug
Corporation, et al (1:18-op-45312)*

*The Town of Eleanor, West Virginia v.
AmerisourceBergen Drug Corporation et al
(1:18-op-45387)*

The Town of Fort Gay, West Virginia v. Rite Aid of Maryland, Inc. et al (1:18-op-45225)

The Town of Glenville, West Virginia v. AmerisourceBergen Drug Corporation et al (1:18-op-45384)

The Town of Granville, West Virginia v. AmerisourceBergen Drug Corporation et al (1:18-op-45320)

The City of Hurricane, West Virginia v. AmerisourceBergen Drug Corporation et al (1:18-op-45293)

The City of Logan v. AmerisourceBergen Drug Corporation et al (1:18-op-45317)

The City of Parkersburg, West Virginia v. AmerisourceBergen Drug Corporation et al (1:18-op-45315)

The Town of Quinwood, West Virginia v. AmerisourceBergen Drug Corporation et al (1:18-op-45324)

The Town of Rainelle, West Virginia v. AmerisourceBergen Drug Corporation et al (1:18-op-45322)

The Town of Rupert, West Virginia v. AmerisourceBergen Drug Corporation et al (1:18-op-45323)

The City of Saint Albans, West Virginia v. AmerisourceBergen Drug Corporation et al (1:18-op-45269)

The City of Summersville v. AmerisourceBergen Drug Corporation et al (1:18-op-45316)

The Town of Sutton, West Virginia v. Cardinal Health, Inc., et al (1:18-op-45318)

The City of Smithers, West Virginia v. AmerisourceBergen Drug Corporation et al (1:18-op-45319)

City of Bluefield, West Virginia v. AmerisourceBergen Drug Corporation et al
(1:18-op-45659)

The City of Dunbar, West Virginia v. AmerisourceBergen Drug Corporation et al
(1:18-op-45546)

The City of Milton, West Virginia v. AmerisourceBergen Drug Corporation et al
(1:18-op-45321)

County of Portage, Ohio et al v. Purdue Pharma L.P. et al (1:18-op-45993)

Itasca County, Minnesota v. Purdue Pharma L.P. et al (1:18-op-45958)

Dakota County v. Purdue Pharma L.P. et al
(1:18-op-46112)

The City of Princeton, West Virginia v. AmerisourceBergen Drug Corporation
(1:18-op-46054)

The City of Buckhannon, West Virginia v. McKesson Corporation et al (1:18-op-46085)

The Gilmer County Commission v. Cardinal Health, Inc. et al (1:18-op-46131)

The Town of Clendenin, West Virginia v. AmerisourceBergen Drug Corporation et al
(1:18-op-46127)

The City of Montgomery, West Virginia v. AmerisourceBergen Drug Corporation et al
(1:18-op-46128)

The Town of Sophia, West Virginia v. AmerisourceBergen Drug Corporation et al
(1:18-op-46129)

The Town of Whitesville, West Virginia v. AmerisourceBergen Drug Corporation et al
(1:18-op-46130)

City of Fall River v. Purdue Pharma L.P. et al (1:18-op-46285)

The Town of Gauley Bridge, West Virginia v. AmerisourceBergen Drug Corporation et al (1:18-op-46278)

City of Providence, Rhode Island v. AmerisourceBergen Drug Corporation et al (1:18-op-45844)

Stark County, Ohio Board of County Commissioners et al v. Purdue Pharma L.P. et al (1:18-op-46340)

Montgomery County Board of County Commissioners et al v. Purdue Pharma L.P. et al (1:18-op-46080)

The City of Kenova, West Virginia v. AmerisourceBergen Drug Corporation et al (1:18-op-46346)

City Of Quincy v. Purdue Pharma, LP et al (1:19-op-45008)

The City of Clearwater in the County of Pinellas v. Purdue Pharma L.P. et al (1:19-op-45009)

City of Lakewood, et al v. Purdue Pharma L.P. et al (1:18-op-45800)

The City of Winfield, West Virginia v. AmerisourceBergen Drug Corporation et al (1:18-op-45294)

City of Barberton et al v. Purdue Pharma, L.P., et al (1:18-op-45767)

St. Louis County, Minnesota v. Purdue Pharma L.P., et al (1:18-op-45430)

Minneapolis, Minnesota v. Purdue Pharma L.P. et al (1:18-op-45850)

County of Tuscarawas v. Purdue Pharma L.P. et al. (1:19-op-45098)

STIPULATION

Plaintiffs in the above captioned actions (“Plaintiffs”) and Defendants Jonathan Sackler, Kathe Sackler, and Richard Sackler (“Individual Defendants”), by and through their undersigned counsel, submit this Stipulation and state as follows:

WHEREAS Plaintiffs filed these actions against the Individual Defendants by filing Short Forms for Supplementing Complaint and Amending Defendants and Jury Demand (“Amended Complaints”) in the multidistrict litigation *In re: National Prescription Opiate Litigation*, MDL No. 2804 (N.D. Ohio) (“MDL proceeding”); and

WHEREAS all responsive pleading deadlines for actions in the MDL proceeding other than those referenced in paragraphs 2 or 3 of CMO-1 [Dkt. 232] are stayed pending further court order.

THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and between the undersigned counsel for Plaintiffs and the undersigned counsel for the Individual Defendants that:

1. The undersigned counsel for the Individual Defendants agree to and hereby accept service, via e-mail, of Plaintiffs’ Amended Complaints in these actions and certify that they are authorized to do so;

2. The deadline for the Individual Defendants to answer or move to dismiss Plaintiffs’ Amended Complaints shall be sixty (60) days from entry of an order lifting the stay as to responsive pleadings in cases not referenced in paragraphs 2 or 3 of CMO-1, or such other date as the court in the MDL proceeding may order, whichever is later;

3. In the event that any of the above captioned actions is (i) remanded from the MDL proceeding to the state court in which such action was originally filed, or (ii) transferred from the

MDL proceeding to the federal district court in which such action was originally filed or removed, the deadline for the Individual Defendants to answer or move to dismiss the applicable Amended Complaint shall be sixty (60) days from entry of the remand or transfer order, or such other date as the court to which such action was remanded or transferred may order, whichever is later; and

4. By entering into this Stipulation, Plaintiffs agree that the Individual Defendants neither submit to the jurisdiction of this Court or the court in which any of the above-captioned actions was originally filed nor waive any defense, including lack of personal jurisdiction. The Individual Defendants waive only the defenses of insufficient process and insufficient service of process.

DATED: June 19, 2019

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DATED: June 19, 2019

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